

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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J.C. individually, and all others : Civil Action  
similarly situated, :  
Plaintiffs : No. 15-4745

v.

Nicholas Ford, Steffen Boyd,  
Josette Springer, Shonda Williams,  
John W. Harrison E. Martinez, Steven Austin,  
Darlene Miller, Charles Hoyt, :  
Defendants

**PLAINTIFF'S RULE 59(E) MOTION FOR RECONSIDERATION**

**I. Scope Of Review Rule 59e**

A motion for reconsideration is proper for factual and legal matters that may (were here) have overlooked. Glendon Energy Co. v. Borough of Glendon, 836 F. Supp. 1109, 1122 (E.D. Pa. 1993). It doesn't say whether it must be unintentional or not. A reconsideration is also appropriate when a court has "“patently misunderstood a party, has made a decision outside the adversarial issues presented to the Court by the parties, has made an error not of reasoning but of apprehension.” See Singh v. George Washington Univ., 383 F. Supp. 2d 99, 101 (D.D.C. 2005); Bank of Waunake v. Rochester Cheese Sales, Inc., 906 F.2d 1185, 1191 (7th Cir. 1990). “Errors of apprehension may include a court’s failure to consider ‘controlling decisions or data that might reasonably be expected to alter the conclusion reached by the court.’” Shrader v. CSX Transp., Inc., 70 F.3d 255, 257 (2d Cir. 1995).

**II. Argument**

I couldn't be more delighted to put a strike on record so shortly into your pitiful career. Even though they skipped all the truth, the end result is that it is history that you did wrong (intentionally)- like they knew you would. Not surprisingly at all, there is no mention of that in the new slop that came from you. Another joke, two sentence document that "the parties shall be afforded 30 days to brief, whether Plaintiff can adequately state a claim against Defendants in their individual capacity." Keeping up with being a total excuse of a court, you bypassed basic procedure that must be followed. Here as you know the procedure is for them to have 21 days to file a motion to dismiss or answer the complaint (or both), then Plaintiff has 21 days to respond.

Plaintiff filed a complaint, the offenders never filed anything to respond to it, it is illogical for Plaintiff to file anything proactively because that is not his job, the complaint is the filing, they have to respond to it not Plaintiff, Plaintiff can only reply to their response.<sup>1</sup> Otherwise he would just be repeated the substance of the complaint, since the complaint itself made claims. This makes no sense at all. This is again one of the many, many reasons they all tried to stop you. I am sending a copy of the decision and my brief to all of those who voted against you, to let them know they were spot on, give them an update on their sorry candidate. Hopefully I can do the same on the next one, but if not you have dozens of cases coming from me.

### **CONCLUSION**

They are to be ordered to file a reply to the complaint within 21 days and then Plaintiff responds within 21 days.

J.C., Plaintiff

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<sup>1</sup> Contrary what you attempt to assert, there is no "supplemental briefing" there has been none regarding this as you know.

Dated: January 12th, 2016

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J.C. :  
Plaintiff : Civil Action  
v. No. 15-4745

Ford, Et, al :  
Defendant

**CERTIFICATE OF SERVICE**

I do hereby certify that service of a true and correct copy of Motion For Reconsideration has been made available by CM/ECF

Criminal Boyle  
620 Freedom Business Center, Suite 300  
King Of Prussia, PA 19406

J.C.  
Box 934  
Philadelphia, PA 19105

Dated: January 12th, 2016